

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SUSANNE STONE MARSHALL; ADELE FOX;
MARSHA PESHKIN; RUSSELL OASIS; A & G
GOLDMAN PARTNERSHIP; and PAMELA
GOLDMAN,

Defendants.

Bankruptcy Case No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 14-01840 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO
COMPLAINT AND ADJOURNING PRE-TRIAL CONFERENCE**

Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by and through his counsel, and certain of the defendants, A&G Goldman Partnership and Pamela Goldman (collectively, the “Goldman Defendants”), by and through their counsel, hereby stipulate and agree as follows:

WHEREAS, on March 11, 2014, the Trustee commenced the above-captioned action by filing with this Court (the “Bankruptcy Court”) a Complaint (the “Complaint”) and Application for Enforcement of Permanent Injunction and Automatic Stay (the “Application”); and

WHEREAS, on March 11, 2014, the Trustee filed a Notice of Application (the “Notice”) providing notice that the deadline to respond to the Application was April 18, 2014 and that a hearing on the Application (the “Hearing”) is scheduled to take place on May 7, 2014, at 10:00 a.m. before the Bankruptcy Court; and

WHEREAS, on March 14, 2014, a summons was issued scheduling a pre-trial conference in the matter for April 29, 2014 at 10:00 a.m., and directing the captioned defendants, including the Goldman Defendants, to respond to the Complaint by April 14, 2014;

WHEREAS, on April 17, 2014, the Goldman Defendants requested an extension of the time by which they may respond to the Complaint; and

WHEREAS, the Trustee has agreed to extend the Goldman Defendants’ time to respond to the Complaint;

WHEREAS, the deadline for the Goldman Defendants to respond to the Application remains April 18, 2014 and the Hearing remains scheduled for May 7, 2014 at 10:00 a.m.:

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
BETWEEN THE TRUSTEE AND THE GOLDMAN DEFENDANTS:

1. The time by which the Goldman Defendants may respond to the Complaint is extended from April 14, 2014 through and including May 15, 2014.
2. The pre-trial conference previously scheduled for April 29, 2014 has been adjourned to May 28, 2014 at 10:00 a.m.
3. The extension shall not affect, delay or prejudice the Trustee's Application or prevent the Bankruptcy Court from substantively ruling on the Application at or in connection with the Hearing. This extension is without prejudice to the parties agreeing to further extensions as to the Complaint.
4. The deadline for the Goldman Defendants to respond to the Application remains April 18, 2014, and the Hearing remains scheduled for May 7, 2014 at 10:00 a.m.
5. Other than as set forth above, the parties hereto reserve all rights and defenses they may have in this action, and entry into this stipulation shall not impair or otherwise affect any such rights.

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Dated: April 21, 2014
New York, New York

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of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

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Attorneys for the Goldman Defendants

SO ORDERED this 21st day of April, 2014

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY COURT JUDGE